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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Daniel Garcia Cervantes,)	Case No. 1:20-cv-01446-JLT-BAM
Plaintiff,)	STIPULATION AND PROPOSED
vs.)	ORDER FOR EXTENSION OF
)	TIME
Martin O'Malley, Commissioner of)	
Social Security ¹ ,)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 14-day extension of time, from August 9, 2024 to August 23, 2024, for Plaintiff to serve on defendant with PLAINTIFF'S

¹ Martin O'Malley became the Commissioner of Social Security on December 20, 2023. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Martin O'Malley should be substituted for Kilolo Kijakazi as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 OBJECTIONS TO FINDINGS AND RECOMMENDATIONS . All other dates in
2 the Court's Scheduling Order shall be extended accordingly.

3 This is Plaintiff's first request for an extension of time. Plaintiff respectfully
4 states that the requested extension is necessary due several merit briefs being due
5 on the same week. For the weeks of August 5, 2024 and August 12, 2024,
6 Plaintiff's Counsel has seven Merit briefs and one Reply brief due. Counsel
7 requires additional time to brief the issues thoroughly for the Court's
8 consideration. Defendant does not oppose the requested extension. Counsel
9 apologizes to the Defendant and Court for any inconvenience this may cause.

10
11 Respectfully submitted,

12 Dated: August 9, 2024 PENA & BROMBERG, ATTORNEYS AT LAW
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14 By: /s/ Jonathan Omar Pena
15 JONATHAN OMAR PENA
16 Attorneys for Plaintiff
17

18 Dated: August 9, 2024 PHILLIP A. TALBERT
19 United States Attorney
20 MATHEW W. PILE
21 Associate General Counsel
22 Office of Program Litigation
23 Social Security Administration

24 By: */s/ Sathya Oum
25 Sathya Oum
26 Special Assistant United States Attorney
27 Attorneys for Defendant
28 (*As authorized by email on August 9, 2024)

ORDER

Pursuant to stipulation and good cause appearing, Plaintiff shall serve and file his Objections to the Court's Findings and Recommendations on or before **August 23, 2024**.

IT IS SO ORDERED.

Dated: **August 12, 2024**

/s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE